Amendments to the Drawings

The attached Replacement Drawing Sheet containing Fig. 1A replaces the originally-filed drawing sheet containing Fig. 1A of this Application. The Replacement Drawing Sheet corrects the reference number for dialog box 44 illustrated in Fig. 1A.

<u>Remarks</u>

The Applicant has amended the first sentence of the specification to include the Related Applications section outlining the priority claim. The benefit claim was timely made and was recognized by the Office on the official filing receipt of the current application. As such, amendment without any petition is proper under M.P.E.P §201.11 (III)(D).

Claims 48-76 are currently pending in the present application. No new matter was added by this Amendment. Applicant respectfully requests reexamination and reconsideration in view of the remarks contained herein.

I.   Claim Rejections under 35 USC § 103(a)

Claims 48-76 stand rejected under 35 USC § 103(a) as being anticipated by U.S. Patent No. 6,026,398 issued to Brown et al. (hereinafter referred to as "Brown") in view of U.S. Patent No. 6,160,874 issued to Dickerman et al. (hereinafter referred to as "Dickerman"). As described below in more detail, Brown and Dickerman, taken individually or in combination, do not teach or suggest the subject matter of these claims.

A.   Independent Claim 48

Independent Claim 48 recites:

> A debit data validation system for a network, the system comprising:
> a calling application configured to
>   receive a request to validate debit data, and
>   receive transactional debit data that is to be validated;
> a debit data search engine including a keying module and a matching
> module, wherein the debit data search engine is configured to
>   receive the transactional debit data from the calling application,
> and
>   process the transactional debit data; and
> a debit data warehouse including stored debit data, wherein the stored
> debit data is representative of at least one consumer, and further wherein at least
> one consumer key links the stored debit data representative of each of the at least
> one consumer.

Brown does not teach or suggest the subject matter of Claim 48. First, Brown does not teach or suggest "a calling application configured to receive a request to validate debit data, and receive transactional debit data that is to be validated," as recited in Claim 48. Rather, the subject matter of Brown concerns determining "database records which either closely or exactly match the input search data." Abstract. In particular, Brown discloses that the "input search data is broken down into elements, and elements are converted to terms having a finite set of possible values. ... The terms are compared against an index of terms to determine which database records relate to the input search data. Through statistical analysis, match records are given a record weight which may be used to calculate how closely the input data actually is to each match record." Abstract. Clearly, Brown merely discloses receiving input data, processing the input data, and determining matching database records based on the input data. Brown does not teach or suggest validating any type of data. Furthermore, Brown makes no mention whatsoever processing debit data or transactional debit data. Therefore, Brown clearly does not teach or suggest "a calling application configured to receive a request to validate debit data, and receive transactional debit data that is to be validated," as recited in Claim 48.

Similarly, Brown does not teach or suggest "a debit data search engine including a keying module and a matching module, wherein the debit data search engine is configured to receive the transactional debit data from the calling application, and process the transactional debit data," as recited in Claim 48. First, as noted above, Brown makes no mention whatsoever of processing any type of debit data. Furthermore, Brown does not teach or suggest "a calling application" as recited in Claim 48. Therefore, Brown clearly does not teach or suggest "a debit data search engine...configured to receive the transactional debit data from the calling application, and process the transactional debit data," as also recited in Claim 48.

In addition, Brown does not teach or suggest "a debit data search engine including a keying module and a matching module," as recited in Claim 48. As described in the present application, in some embodiments, the "keying module 1222 of the debit data search engine 1220 is utilized...to perform the keying process. ... The keying process links debit data acquired from a number of data sources...to form at least one consumer key or consumer identifier." Page 33, lines 17-24. In addition, the present application states that "the consumer keys...are stored in the debit data warehouse 1230." Page 34, lines 24-26. Brown does not teach

or suggest a search engine that includes a keying module. Rather, as noted above, Brown discloses obtaining input search data, breaking the search data into elements, converting the elements into terms having a finite set of possible values, and comparing the terms against an index in order to determine which database records relate to the input search data. Therefore, Brown merely discloses identifying and pulling matching database records from a single database. Brown does not teach or suggest receiving data from multiple sources or linking data received from multiple sources. Accordingly, Brown does not teach or suggest a keying module as recited in Claim 48.

Brown also does not teach or suggest a matching module as recited in Claim 48. As described in the present application, in some embodiments, the "matching component includes matching debit data from the data sources 1300 (i.e., acquired debit data) against the debit data stored in the debit data warehouse 1230 (i.e., stored debit data). The matching component determines what acquired debit data can be linked to the stored debit data. ... If a match is found between the acquired debit data and the stored debit data, then the acquired data is additionally linked to the consumer key that is representative of the matched stored debit data." Page 35, lines 13-23. Brown does not disclose attempting to match and link data to data stored in a database. Rather, as noted above, Brown merely discloses identifying and pulling matching database records from a database. Brown makes no mention whatsoever of linking data to the data stored in the database. Therefore, Brown does not teach or suggest a matching module as recited in Claim 48.

Furthermore, Brown does not teach or suggest "a debit data warehouse including stored debit data, wherein the stored debit data is representative of at least one consumer, and further wherein at least one consumer key links the stored debit data representative of each of the at least one consumer," as recited in Claim 48. As previously noted, Brown makes no mention whatsoever of storing or processing debit data. Therefore, Brown clearly does not teach or suggest "a debit data warehouse including stored <u>debit</u> data, wherein the stored <u>debit</u> data is representative of at least one consumer," as recited in Claim 48 (emphasis).

In addition, Brown does not teach "at least one consumer key [that] links the stored debit data representative of each of the at least one consumer," as recited in Claim 48. As described in

the present application, in some embodiments, "[t]he debit data acquired from the data sources 1300 is linked together to form at least one consumer key or consumer identifier. ... Each consumer key may represent the overall debit worthiness picture of a particular consumer which is based only upon reliable debit data acquired from the data sources 1300." Page 33, lines 22-30. As described above, since Brown does not teach or suggest processing debit data, Brown clearly does not teach or suggest storing a consumer identifier, which is created based on linked debit data related to a consumer. In fact, Brown makes no mention whatsoever of a link that associates data stored in a database with a particular consumer.

Therefore, in summary, Brown does not teach or suggest "a calling application configured to receive a request to validate debit data, and receive transactional debit data that is to be validated;" "a debit data search engine including a keying module and a matching module, wherein the debit data search engine is configured to receive the transactional debit data from the calling application, and process the transactional debit data;" or "a debit data warehouse including stored debit data, wherein the stored debit data is representative of at least one consumer, and further wherein at least one consumer key links the stored debit data representative of each of the at least one consumer," as recited in Clam 48.

Dickerman does not cure the deficiencies of Brown. Rather, the subject matter of Dickerman concerns a method for "receiving, converting protocol, and sending messages to process customer credit card requests." Col. 3, lines 63-65. In particular, Dickerman discloses systems and methods for establishing "[c]ommunication between telecommunications networks and computer systems used by financial institutions... [in order to process] customer requests to pay for telecommunication services with credit cards...." Abstract.

As disclosed in Dickerman, "[t]he system...comprises a validation gateway that has a computer program that provides for the transfer of messages and conversion of protocol to allow communication between the telecommunications network that received the call and the computer system used by the financial institution that provides the customer with credit card services." Col. 3, lines 12-18. Dickerman also discloses that the "computer program on the validation gateway includes software modules that perform specific functions. Modules within the computer program of the validation gateway receive messages from and send messages to caller

interaction processors. Caller interaction processors are processors that allow a human operator to interact or interact directly with a debit customer to receive call processing information from customer." Col. 3, lines 24-31.

As further disclosed in Dickerman, "[t]he method of the present invention includes the steps for receiving a validation request message from a caller interaction processor, building a card request message that can be understood by the financial processor, and sending the card request message to the financial processor. The method of present invention also includes the steps for receiving a card reply message from the financial processor, building a validation response message that can be understood by the caller interaction processor, and sending the validation response message to the caller interaction processor." Col. 3, lines 65-67 and Col. 4, lines 1-8. As disclosed in Dickerman, the validation request message "contains transaction data such as the customer's credit card account number, the credit card type, the expiration date of the credit card, and the amount the customer wishes to charge to the credit card." Col. 7, lines 43-47.

Dickerman merely discloses a gateway that receives <u>credit</u> card authorization requests from a telecommunications network, converts the <u>credit</u> card authorization requests to a request understandable by a financial institution network, and forward the request to the financial institution network. The request does not include any debit data or transactional debit data. Therefore, Dickerman does not teach or suggest "a calling application configured to receive a request to validate <u>debit</u> data, and receive transactional <u>debit</u> data that is to be validated," as recited in Claim 48 (emphasis added).

In addition, Dickerman does not teach or suggest "a debit data search engine including a keying module and a matching module, wherein the debit data search engine is configured to receive the transactional debit data from the calling application, and process the transactional debit data," as recited in Claim 48. First, as noted above, since Dickerman does not teach or suggest processing debit data, Dickerman clearly does not teach or suggest "a debit data search engine...configured to receive the transactional debit data from the calling application, and process the transactional debit data," as recited in Claim 48.

In addition, Dickerman does not teach or suggest "a debit data search engine including a keying module and a matching module," as recited in Claim 48. As noted above, in some embodiments, the keying module links <u>debit</u> data acquired from multiple sources in order to form customer links, and the matching module attempts to match <u>debit</u> data acquired from multiple sources to <u>debit</u> data stored in a <u>debit</u> data warehouse. The validation gateway disclosed in Dickerman performs none of these functions. First, the validation gateway only processes credit data. Second, the validation gateway disclosed in Dickerman does not attempt to match and link data acquired from multiple sources. Therefore, Dickerman clearly does not teach or suggest "a debit data search engine including a keying module and a matching module, wherein the debit data search engine is configured to receive the transactional debit data from the calling application, and process the transactional debit data," as recited in Claim 48.

Furthermore, Dickerman does not teach or suggest "a debit data warehouse including stored debit data, wherein the stored debit data is representative of at least one consumer, and further wherein at least one consumer key links the stored debit data representative of each of the at least one consumer," as recited in Claim 48. As noted above, in some embodiments of the present invention, "[t]he debit data acquired from the data sources 1300 is linked together to form at least one consumer key or consumer identifier. ... Each consumer key may represent the overall debit worthiness picture of a particular consumer which is based only upon reliable debit data acquired from the data sources 1300." Page 33, lines 22-30. Dickerman does not disclose a link that associates data stored in the database with a particular consumer. Although Dickerman discloses multiple databases used by the telecommunications network, the validation gateway, and the financial institution, Dickerman does not teach or suggest a link that associates debit data stored in a database with a particular consumer.

Therefore, Brown and Dickerman, taken individually or in combination, do not teach or suggest "a calling application configured to receive a request to validate debit data, and receive transactional debit data that is to be validated;" "a debit data search engine including a keying module and a matching module, wherein the debit data search engine is configured to receive the transactional debit data from the calling application, and process the transactional debit data;" or "a debit data warehouse including stored debit data, wherein the stored debit data is representative of at least one consumer, and further wherein at least one consumer key links the

stored debit data representative of each of the at least one consumer," as recited in Clam 48. Consequently, for at least the reasons set out above, independent Claim 48 and dependent Claims 79-75, which depend on Claim 48, are allowable. Similar rationale can also be applied to independent Claim 76. Accordingly, Claims 48-76 are allowable for at least the reasons set out above.

II.   Conclusion

In light of the above, Applicant believes that the application is in condition for allowance and respectfully request that a timely Notice of Allowance be issued in this case. Applicant also requests that the Examiner telephone the attorneys of record in the event a telephone discussion would be helpful in advancing the prosecution of the present application.

Respectfully submitted,

Thomas A. Miller
Reg. No. 36,871

File No. 025213-9075-00
Michael Best & Friedrich LLP
100 East Wisconsin Avenue
Suite 3300
Milwaukee, Wisconsin 53202-4108
414.271.6560